



Anjanette Cabrera
Constangy, Brooks, Smith & Prophete
620 Eighth Avenue, 38th Floor
New York, New York 10018
Phone: 646.341.6536
Email: acabrera@constangy.com

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VIA ECF

The Honorable Katharine H. Parker
United States Magistrate Judge
United States District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: Abdelsayed v. NYU, Case No. 1:17-cv-09606-VSB-KHP

The Honorable Katharine H. Parker:

Defendants New York University, NYU Langone Medical Center, NYU School of Medicine, and NYU Langone Hospital-Brooklyn f/k/a NYU Lutheran Medical Center respectfully request an extension of the expert-discovery deadline from November 29, 2019 to **December 31, 2019**. There have been no previous requests for an extension of the expert-discovery deadline. Plaintiff George Abdelsayed has consented to this request.

Defendants are making this request for these reasons:

- Plaintiff has produced an expert report from Dr. Susan Williams. Dr. Williams is on vacation for several weeks and is not available for deposition until late November. Although Plaintiff's counsel has provided several dates in mid to late November for Dr. Williams' deposition, Defendants' counsel is unavailable on those dates.
- Plaintiff has also produced an expert report from Dr. Steven Shapiro. Defendants anticipate that they will need to produce an expert report rebutting the testimony of Dr. Shapiro and/or the testimony of Dr. Williams. In light of the Thanksgiving holiday, it will be difficult to schedule potentially four depositions of expert witnesses: Dr. Williams, Dr. Shapiro, and the one or two experts on behalf of Defendants to be disclosed in November.
- Defendants' counsel notes that they are unavailable for depositions the week of the Thanksgiving holiday.



Thank you for Your Honor's consideration of this request.

Respectfully submitted,

/s/ Anjanette Cabrera
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